

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA**

ELIZABETH SINES	:	Case No. 3:17-cv-00072
Plaintiff	:	Judge MOON
	:	Mag. Judge Hoppe
	:	
-v-	:	
JASON KESSLER et al.	:	
	:	
Defendants		

**DEFENDANTS' PROPOSED QUESTIONS
TO BE INCLUDED IN JURY QUESTIONNAIRE**

Now come defendants Jason Kessler, Nathan Damigo, and Identity Evropa and respectfully request the Court to include the following questions in the questionnaire which will be sent to prospective jurors in this case.

1. "Have you or an immediate family member ever been the victim of a violent crime?"
2. "Have you or an immediate family member ever been injured in a car accident?"
3. "Have you or an immediate family member ever been mistreated due to your race, color, religion, sex, national origin, or any other personal characteristic? If so, please explain how you or your immediate family member were mistreated."

4. "Have you had any legal training or taken any courses in the study of law, including any paralegal program or on-the-job training? If so, please describe."
5. "Do you subscribe to any newspapers, magazines, or news and/or political opinion websites? If so, please identify them."
6. "Do you regularly access any news or politically oriented websites? If so, please identify them."
7. "Have you or an immediate family member been asked your views about race or racism within the last 4 years? If so, please describe."
8. "Do you have any moral, religious, ethical or personal beliefs that would make it difficult for you to fairly and impartially judge persons widely considered to be "racists" in the context of a court trial in which you will be given detailed instructions on the law to be followed? If so, please explain."
9. "Is there anything else that you think the Court should know that might influence your ability to fairly and impartially judge the evidence presented in this case and apply the law as instructed by the Court? If so, please explain."

Respectfully Submitted,

s/ James E. Kolenich
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Trial Attorneys for Jason Kessler,
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CERTIFICATE OF SERVICE

I certify the above was served on August 24, 2021 on all ECF participants and that parties requiring service by other means were served as follows:

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